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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LAJUANA MOTEN and MARIO  
CARDENAS, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

GOODWRX LLC, a Nevada Limited Liability  
Company; and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:25-cv-00778-APG-BNW

**JOINT STIPULATION TO STAY  
DISCOVERY AND CASE DEADLINES  
PENDING THE COURT’S RULING ON  
PLAINTIFF’S MOTION FOR REMAND  
[ECF 11] AND DEFENDANT’S MOTION  
TO COMPEL ARBITRATION [ECF 10]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff LAJUANA MOTEN by and through her counsel of record, Raffi & Associates, P.C., and Defendant GOODWRX LLC by and through its counsel of record, Law Office of Mary Chapman, Ltd. (collectively “Parties”), that all discovery and case deadlines be stayed until the disposition of Plaintiff’s pending Motion for Remand (ECF 11) (“Remand Motion”) and Defendant’s pending Motion to Compel Arbitration (ECF 10) (“Compel Motion”) (collectively “Motions”). This stipulation is submitted and based upon the following:

1. This is the Parties’ first request for a stay of all discovery and case deadlines.
2. The Parties’ joint discovery plan and scheduling order (“DPSO”) is currently due to



1 be filed on June 26, 2025. *See* ECF 9.

2 3. However, currently pending before the Court are Plaintiff's Remand Motion and  
3 Defendant's Compel Motion. Resolution of either of these Motions could preclude further action  
4 in this Court by either of the Parties.

5 4. Hence, given the pendency of these Motions, the Parties desire to avoid the time and  
6 expense of negotiating and observing discovery deadlines, and to avoid wasting judicial resources  
7 on potentially unnecessary discovery disputes or motion practice.

8 5. Accordingly, the Parties have agreed to stay all discovery and case deadlines until  
9 the disposition of the Motions in order to conserve the Parties' resources and for the sake of judicial  
10 economy.

11 6. It is well recognized that "[c]ourts have broad discretion in managing their dockets."  
12 *Byars v. Western Best, LLC*, No. 2:19-CV-1690-JCM-DJA, 2020 WL 8674195, at \*1 (D. Nev. Jul.  
13 6, 2020), citing *Clinton v. Jones*, 520 U.S. 681, 706-07 (1997). In exercising such discretion, "courts  
14 are guided by the goals of securing the just, speedy, and inexpensive resolution of actions." *Id.*; *see*  
15 *also* Fed. R. Civ. P. 1. The Parties agree that good cause exists to stay discovery and all case  
16 deadlines while the Motions are pending, which might effectively require resolution of Plaintiff's  
17 claims in a state or arbitral forum. *See Schrader v. Wynn Las Vegas, LLC*, No. 2:19-cv-02159-JCM-  
18 BNW, 2021 WL 4810324, at \*4 (D. Nev. Oct. 14, 2021); *Aristocrat Techs., Inc. v. Light & Wonder,*  
19 *Inc.*, No. 2:24-CV-00382-GMN-MDC, 2024 WL 2302151, at \*1 (D. Nev. May 21, 2024).

20 7. Proceeding with discovery before the Motions are resolved could cause unnecessary  
21 expense to the Parties and may clog the Court's docket with potentially unnecessary discovery  
22 disputes or motion practice. Consistent with the foregoing, the Parties believe they will be in a  
23 better position to discuss or resume discovery, if at all, after the Motions are resolved.

24 8. For all these reasons, the Parties believe it is in the interest of judicial efficiency and  
25 economy to stay discovery and all case deadlines until the disposition of Plaintiff's Remand Motion  
26 and Defendant's Compel Motion.

27 9. In the event that both Motions are denied, the Parties will submit their joint DPSO  
28 within 14 days after the latter of the Court's denials.

10. The Parties further agree that they are not waiving, relinquishing, or otherwise impairing any claim, defense, or other right they may have by virtue of entering into this Stipulation.

11. This request is made in good faith and not for the purpose of delay.

Dated: June 10, 2025

Law Office of Mary F. Chapman, Ltd.

Rafii & Associates, P.C.

/s/ Mary Chapman (with permission)

/s/ Jason Kuller

Mary F. Chapman, Esq.

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**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2025

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